

## **Comment regarding FCC Proposal RM-11305**

My name is Larry Robison and I am one of the authors of this proposal. I have participated in amateur radio for over 48 years with many modes and many different type of equipment from tubes to integrated circuits.

I am filing in support of RM-11305. My comment here is a response to the many comments that I have seen filed that asks the unthinkable and a possible alternative that may work.

I strongly believe that deregulation and elimination of the subband structure is the only way to fix many of the issues that have worked to frustrate the service, despite the strong opposition. I see the overcrowding of the phone subband and the underutilization of the CW/Digital subband as just one of the ills to be followed by operator rage and bad behavior.

### **Comments:**

Most surprising to me is the overwhelming expression in these comments is that the service is not capable of self regulation. What I hear is a populace that is asking for tighter regulation and enforcement, action that the Commission has repeatedly held not to be consistent with the purpose of the service. Each time I see a comment that speaks of the chaos that would result from such deregulation, I am reminded of the chaos that I heard on 75 meters the last time I turned my receiver on! My observation is that overcrowding has contributed to the behavior that has prompted these fears and the behavior of a few bad apples has terrorized the good operators into thinking this way.

Most amateur operators obey regulations and civil courtesies. A few don't. I hope that we are not becoming many controlled by a few.

### **Alternative:**

I cannot ignore the opposition to deregulation that I see in the comments to RM-11305. I also would hate to see the opportunity to fix the skewed subband allocation disappear with this proposal. I would ask that the Commission explore the possibility of aligning the US amateur subbands with the suggestions contained in the IARU Region 2 band plan. Using this band plan as an outline for changes to current Part 97 allocations has several positive results:

- Aligning the US allocations to those of the international community.
- Since it is a mode based plan, it introduces none of the complication associated with "bandwidth" based plans.
- It would expand the sub bands of the more popular "phone" modes, allowing breathing room, and yet maintain protected areas for the narrower modes that seem to be the basis for substantial opposition.
- Maintain ease of self policing that has been an economy for the FCC!

Attention would need to be paid to:

- License class privileges as an overlay to the IARU Region 2 band plan.
- Language to address the automatic digital modes.

I would like to thank the Commission for making the effort to address these issues.

Respectfully submitted,  
Larry Robison